

The Commonwealth of Massachusetts
Executive Office of Health and Human Services
Department of Public Health
William A. Hinton State Laboratory Institute
305 South Street, Jamaica Plain, MA 02130

DEVAL L. PATRICK
GOVERNOR

TIMOTHY P. MURRAY
LIEUTENANT GOVERNOR

JUDYANN BIGBY, MD
SECRETARY

JOHN AUERBACH
COMMISSIONER

Jessica Katz, ADA

Plymouth County District Attorney's Office
By e-mail

September 6, 2011

Re: Comm. v. [REDACTED]

ADA Katz,

Please find below a discovery package for the case noted above. The material is collated in the following manner:

- 1) the c.v.'s of the chemists
- 2) the Evidence Office receipt to the Brockton Police
- 3) the inventory control card
- 4) the Pharmaceutical Analysis Sheet for the exhibit
- 5) the pharmacopeia text for the oxycodone (Micromedex)
- 6) the gas chromatography/mass spectrometry (gc/ms) data

I was the custodial chemist responsible for the chain of custody, weights and the preliminary analysis of the exhibit. Annie Dookhan operated the gc/ms for the confirmatory tests.

If you need further clarification of this material, call me directly at (617) 983-6627.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Lawler".

Michael Lawler
Senior Chemist

Cc: A.Dookhan

Curriculum Vitae

Michael Lawler

Education:

University of Virginia, Charlottesville, Va. Bachelor of Arts in English, 1975

Harvard University, Cambridge, Ma. Master of Arts in biology, 1995

Experience:

1990-present currently Chemist III, Mass. Dept. of Public Health, Drug Lab analyst determining the identity of unknown substances and providing expert testimony in the Courts. Conduct special testing for poisons within drug exhibits. Lab Safety Officer.

2005-2008 lecturer in chemistry, Curry College, Milton, Ma.

1988-1990 New England Newborn Screening (NENS) Biochemist conducting pilot studies and validation trials of new newborn screening tests. Investigator and co-author of papers noted below. Introduced screening test for Biotinidase Deficiency. Liaison with interstate collaborators in national studies.

1983-1988 Supervised NENS urine screening lab for metabolic disorders. Conducted research in collaboration with Children's Hospital (Boston) detecting neuroblastoma, a cancer of early childhood. Conducted reference testing for rare metabolic disorders for an international audience.

1982-1983 NENS hypothyroid assay technologist with Tuft's University

1979-1981 Mass. Bay Community College, staff technologist preparing materials for the laboratory technician program, which included reagents, apparatus and maintaining stock cultures of human pathogens.

Additional education and special training

Drug Analysis, completed six week training course by senior staff within the Department of Public Health Drug Analysis Laboratory

National Laboratory Network Training Program course as Expert Witness

Qualified as an expert witness in the Massachusetts Courts and the U.S. District Court
Current Drug Trends – Multijurisdictional Drug Task Force Academy

CDC course in antibiotic resistance CDC course in cell culture

CDC course in public health response to bioterrorism

U.S. Army course in biologic warfare and terrorism

Journal Publications

Screening, 1992, 1:34-37; Lawler,M., Frederick,S., Rodriguez-Anza, S., Wolf,B., Levy,H., *Newborn Screening for Biotinidase Deficiency, Pilot Study and Follow-up of Identified Cases*

Genetic Screening, 1990, 11-18, Mitchell,M., Lawler,M., Walraven,C., Hermos,R., *To Screen or Not to Screen for Congenital Hyperplasia: Is that the Question?*

The Journal of Pediatrics, 116: 78-83, Secor-McVoy,J., Lawler,M., Schmidt, M., Ebers,D., Hart,P., Pettit,D., Blitzer,M., Wolf,B., *Partial Biotinidase Deficiency: Clinical and Biochemical Features*

Professional Affiliations

Northeastern Association of Forensic Scientists (NEAFS) since 2005

Awards

Theobald Smith Education Grant for graduate studies

Curriculum Vitae

Annie Khan (Dookhan)

Education:

University of Massachusetts, Boston, Ma, Master of Science in Chemistry.
University of Massachusetts, Boston, Ma, Bachelor of Science in Biochemistry.

Experience:

2003 – present

Chemist I, II, Massachusetts Department of Public Health, Drug Analysis Laboratory

- *Completed six-week training course conducted by senior staff within the Department of Public Health, Drug Analysis Laboratory.
- *Appointed Assistant Analyst by Assistant Commissioner of Public Health, 2004.
- *Responsible for the identification of illicit drugs to determine violations of harmful and narcotic drug laws.
- *Trained in the use of complex analytical instrumentation, microscopes and balances for the purpose of drug analysis.
- *Maintenance and repairs of all analytical instruments.
- *Responsible for the Quality Control of all analytical instruments, reagents and controls/standards.
- * Responsible for the Quality Control/Quality Assurance program for the drug lab.
- *Notary Public.
- *Qualified as an expert witness in Massachusetts Courts and U.S. District Court

2001 – 2003

QC Analyst I, II, UMMS-Massachusetts Biologic Laboratory, QC Material Control

- *Completed proficiency training conducted by a member of the staff within the MLB Quality Control and Quality Assurance Department.
- *Method Development for creating new techniques and enhancing vaccines for the QC Dept. and FDA.
- *Writing, revising and reviewing Standard Operating Procedures (SOPs).
- *Trained and supervised new chemists and interns for the department.
- *Routine QC testing of products for the FDA.
- *Trained in the use of complex analytical instrumentation, and balances for the purpose of QC analysis for product and validation projects.
- *Calibration, preventive maintenance, QC and QA of analytical instrumentation.
- *Complete testing of chemicals for Vendor Validation Project for the FDA.
- *Compendial testing and interpretation of the USP, ACS, FCC, AOAC, Merck Index, PDR, etc.

Additional Training:

Dept. of Justice – Forensics Professionals. (numerous trainings)
GLP/GMP course with Massachusetts Biologic Laboratory.
QC/QA training according to FDA Codes and Regulations.
GC and GC/MS courses with Agilent Technologies and Restek.
HPLC course with Waters Cooperation.
FTIR course with Spectros.
TOC training with MBL and Sievers.

Association:

American Chemical Society (ACS)
Northeastern Association of Forensics Science (NEAFS)

PLEASE PRINT CLEARLY OR TYPE ALL INFORMATION

The Commonwealth of Massachusetts
Executive Office of Health and Human Services

*Department of Public Health
State Laboratory Institute*

Boston Drug Laboratory
Tel (617) 983-6622
Fax (617) 983-6625

Amherst Drug Laboratory
Tel (413) 545-2601
Fax (413) 545-2608

Boston Hours

Amherst Hours

8:00 - 11:00
2:00 - 4:00

9:00 - 12:00
1:00 - 3:00

DRUG RECEIPT

City or Department: Brockton Police Department **Police Reference No.:**

Police Reference No.:

Name and Rank of Submitting Officer: DONOHUE, PATRICK S 380 DOC # R013464

Defendant(s) Name (last,first,initial):

To be completed by Submitter

Description of Items Submitted

To be completed by Lab Personnel

Gross Weight **Lab Number**

Received By:

210

Date: 12-15-10

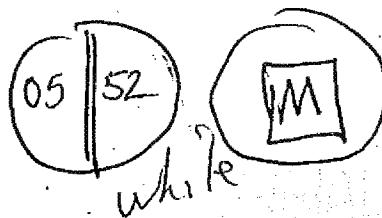
Geim & B
6031715

11-34

Pharmaceutical Analysis Sheet

Sample XXXXXXXXXX City Brockton E.O. weight 2.52

Count 4 tabs Description:



white

Ballistic I.D. oxy codine

I.D. Source micromedex

Final I.D. Oxycodeone MS chemist ASD completed 3-19-11

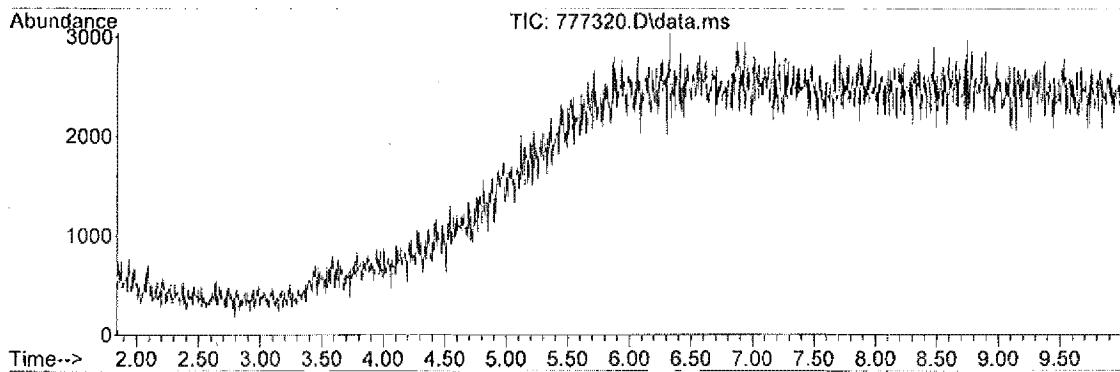
POISINDEX® Product List**Oxycodone Hydrochloride****Regulatory Status:** Schedule II**Ingredients****Active-Ingredient:** Oxycodone Hydrochloride - 5 MG**Availability & Manufacturing****Availability:** United States**Available-Container-Sizes:** Bottle of 100; Package of 5 - 30 count cards; Ten 2 x 5 Blister Cards**Contact:** Covidien Mallinckrodt**Product ID:** 6724458**AAPCC Code:** 037705 - Oxycodone Alone or in Combination (Excluding Combination Products with Acetaminophen or Acetylsalicylic Acid)**Registry Numbers:**
NDC 0406-0552-01
NDC 0406-0552-32
NDC 0406-0552-62**Physical Description****Imprints:** M - The M is contained in a box.
0552 - The imprint 0552 is separated by a score mark.**Alt Imprints:** M0552 - The M is contained in a box.
M 0552 - The imprint 0552 is separated by a score mark.
M 05 52 - The imprint 0552 is separated by a score mark.**Form:** Oral Tablet**Color:** White**Shape:** Circle

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Information from Data File:

File Name : J:\03_17_11\777320.D
Operator : ASD
Date Acquired : 17 Mar 2011 21:27
Sample Name : BLANK
Submitted by :
Vial Number : 1
AcquisitionMeth: DRUGS.M
Integrator : RTE

✓ASD
08.25.11

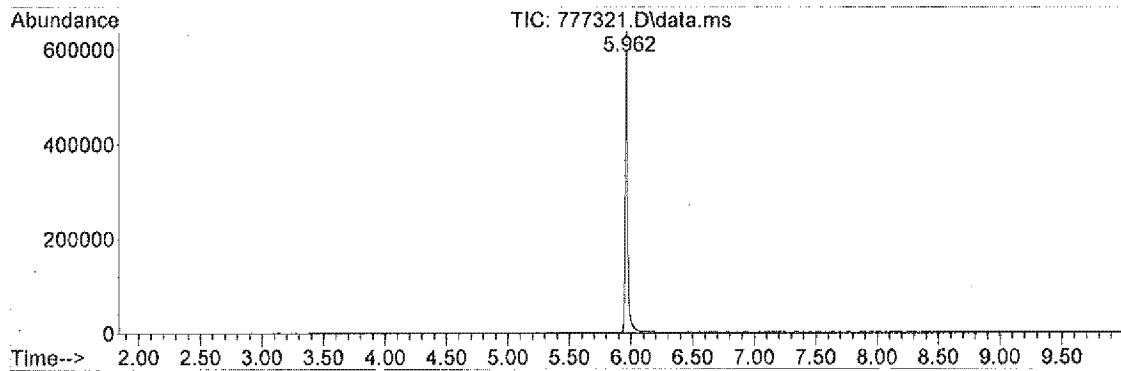


Ret. Time	Area	Area %	Ratio %
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NO INTEGRATED PEAKS

Information from Data File:

File Name : J:\03_17_11\777321.D
Operator : ASD
Date Acquired : 17 Mar 2011 21:39
Sample Name : OXYCODONE STD
Submitted by :
Vial Number : 21
AcquisitionMeth: DRUGS.M
Integrator : RTE



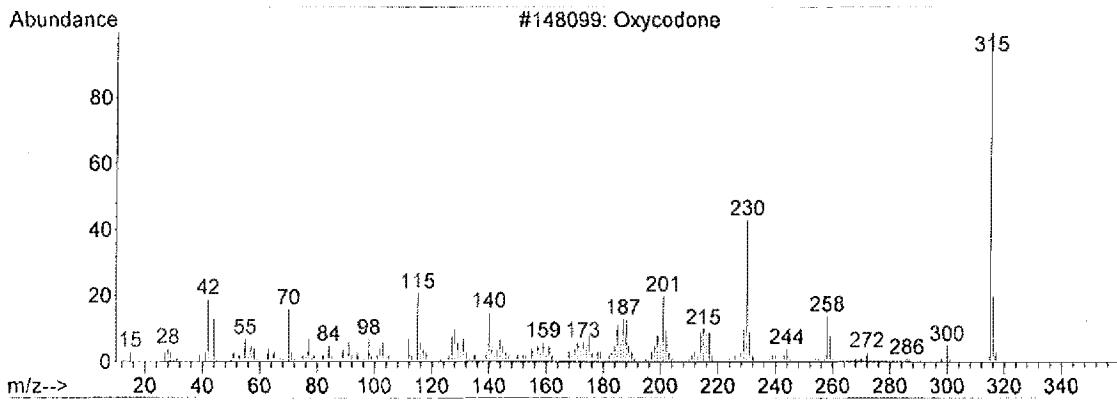
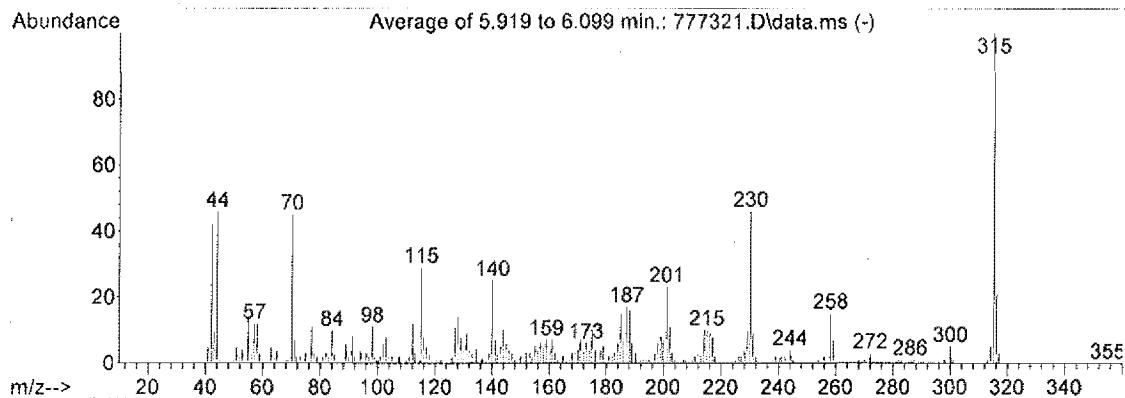
Ret. Time	Area	Area %	Ratio %
5.962	801264	100.00	100.00

Information from Data File:

File Name : J:\03_17_11\777321.D
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 Date Acquired : 17 Mar 2011 21:39
 Sample Name : OXYCODONE STD
 Submitted by :
 Vial Number : 21
 AcquisitionMeth: DRUGS.M
 Integrator : RTE

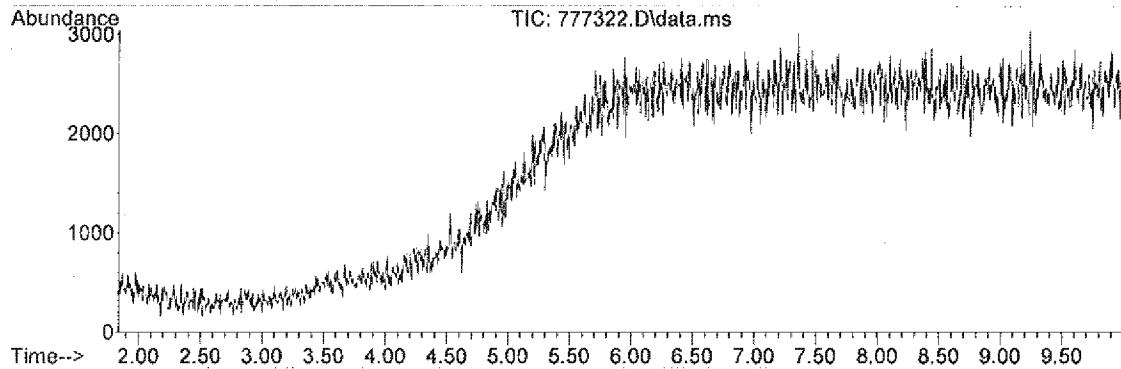
Search Libraries: C:\Database\SLI.L Minimum Quality: 80
 C:\Database\NIST08.L Minimum Quality: 80
 C:\Database\PMW_TOX2.L

PK#	RT	Library/ID	CAS#	Qual
1	5.96	C:\Database\NIST08.L		
		Oxycodone	000076-42-6	99
		Oxycodone	000076-42-6	99
		Oxycodone	000076-42-6	99



Information from Data File:

File Name : J:\03_17_11\777322.D
Operator : ASD
Date Acquired : 17 Mar 2011 21:52
Sample Name : BLANK
Submitted by :
Vial Number : 1
AcquisitionMeth: DRUGS.M
Integrator : RTE

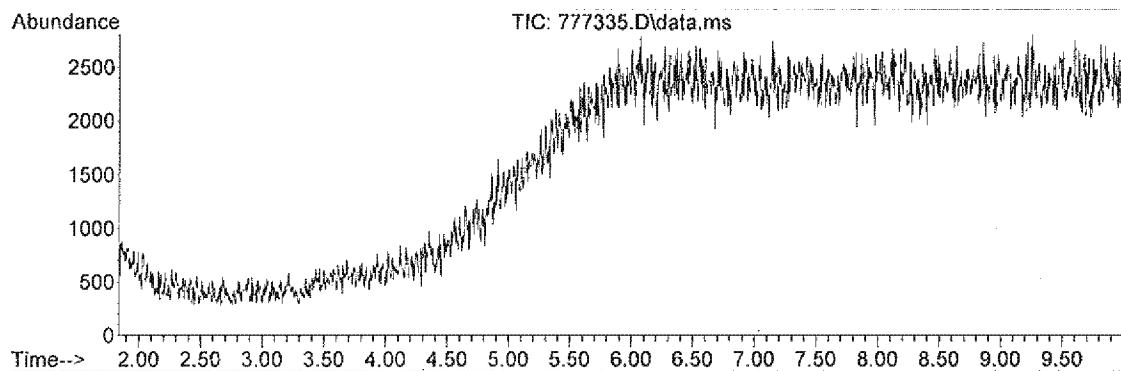


Ret. Time	Area	Area %	Ratio %
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NO INTEGRATED PEAKS

Information from Data File:

File Name : J:\03_17_11\777335.D
Operator : ASD
Date Acquired : 18 Mar 2011 00:34
Sample Name : BLANK
Submitted by : MGL
Vial Number : 2
AcquisitionMeth: DRUGS.M
Integrator : RTE

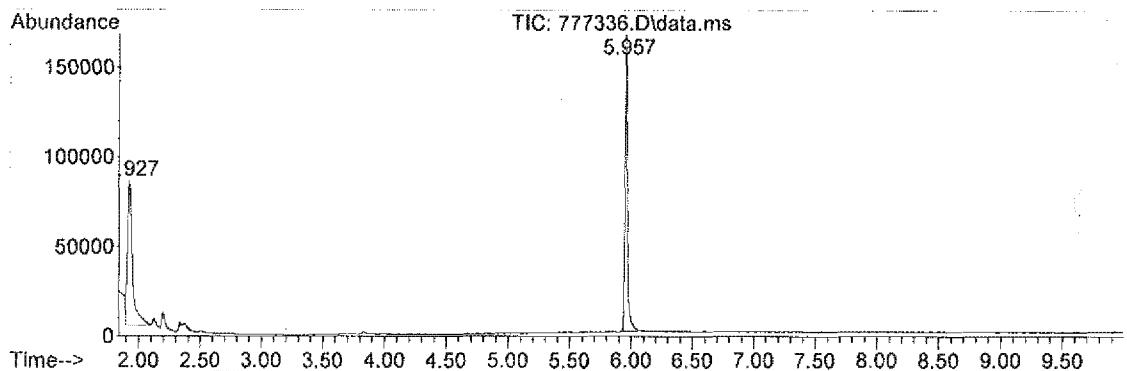


Ret. Time	Area	Area %	Ratio %
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NO INTEGRATED PEAKS

Information from Data File:

File Name : J:\03_17_11\777336.D
Operator : ASD
Date Acquired : 18 Mar 2011 00:46
Sample Name : XXXXXXXXXX
Submitted by : MGL
Vial Number : 36
AcquisitionMeth: DRUGS.M
Integrator : RTE



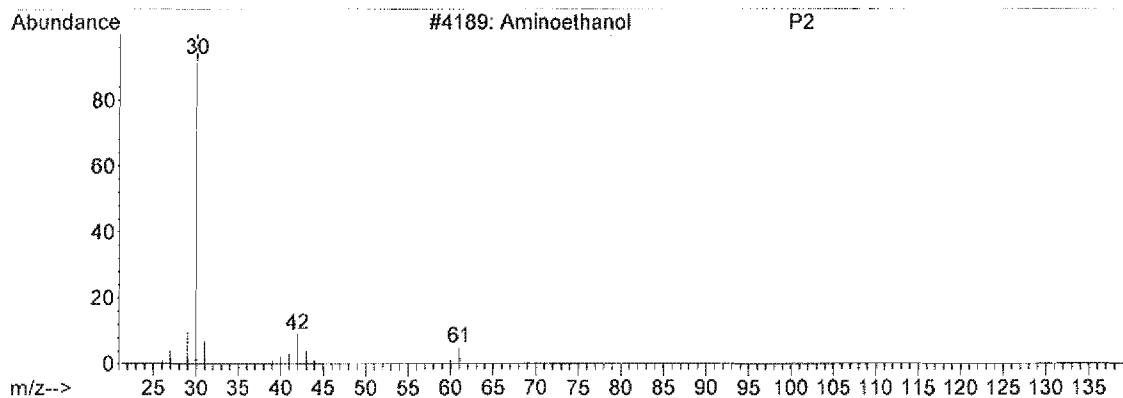
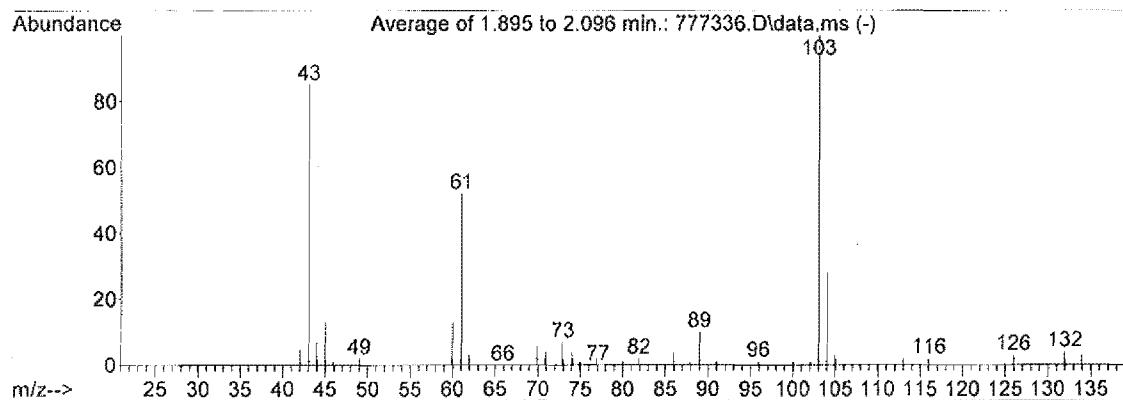
Ret. Time	Area	Area %	Ratio %
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5.957	224973	48.88	95.60

Information from Data File:

File Name : J:\03_17_11\777336.D
Operator : ASD
Date Acquired : 18 Mar 2011 00:46
Sample Name : XXXXXXXXXX
Submitted by : MGL
Vial Number : 36
AcquisitionMeth: DRUGS.M
Integrator : RTE

Search Libraries: C:\Database\SLI.L Minimum Quality: 80
C:\Database\NIST08.L Minimum Quality: 80
C:\Database\PMW_TOX2.L

PK#	RT	Library/ID	CAS#	Qual
1	1.93	C:\Database\PMW_TOX2.L		
		Aminoethanol	000141-43-5	3
		Monolinuron	001746-81-2	1
		Metobromuron	003060-89-7	1



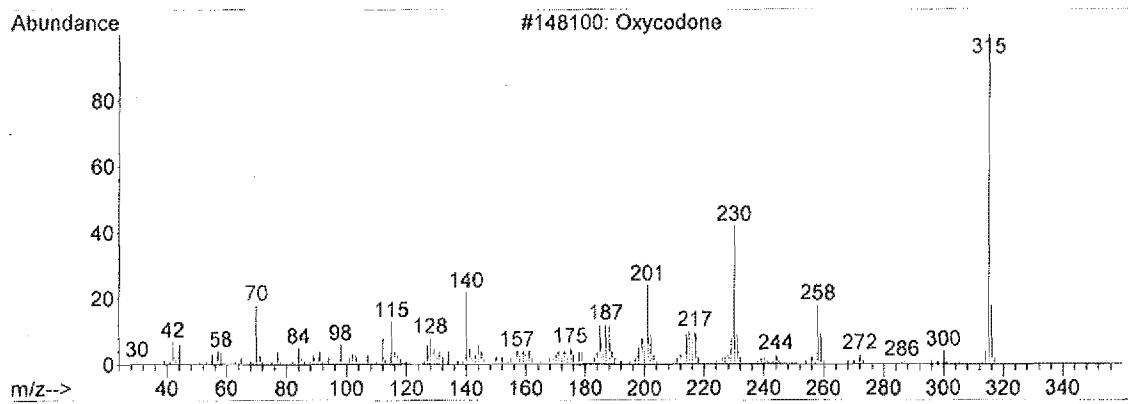
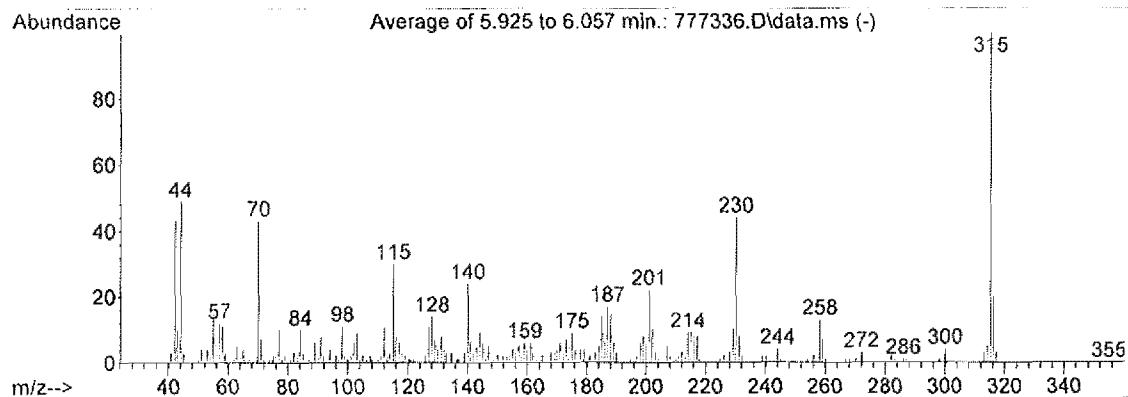
Area Percent / Library Search Report

Information from Data File:

File Name : J:\03_17_11\777336.D
 Operator : ASD
 Date Acquired : 18 Mar 2011 00:46
 Sample Name : XXXXXXXXXX
 Submitted by : MGL
 Vial Number : 36
 AcquisitionMeth: DRUGS.M
 Integrator : RTE

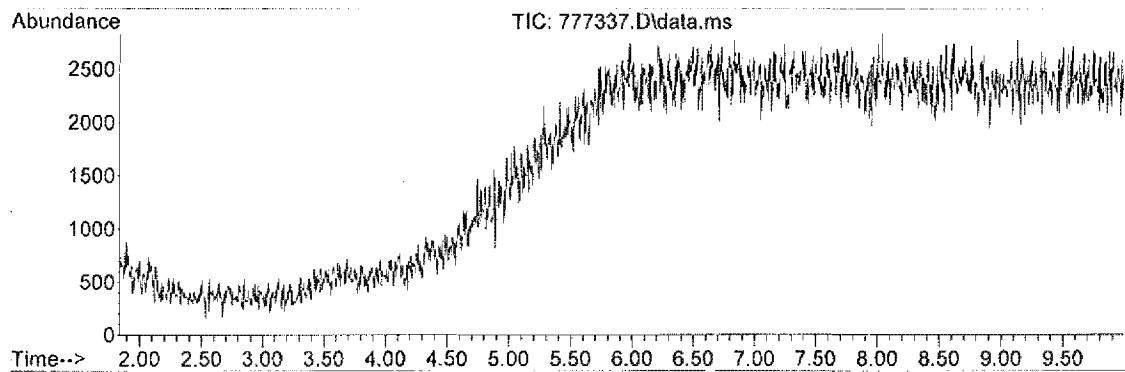
Search Libraries: C:\Database\SLI.L Minimum Quality: 80
 C:\Database\NIST08.L Minimum Quality: 80
 C:\Database\PMW_TOX2.L

PK#	RT	Library/ID	CAS#	Qual
2	5.96	C:\Database\NIST08.L		
		Oxycodone	000076-42-6	99
		Oxycodone	000076-42-6	99
		Oxycodone	000076-42-6	99



Information from Data File:

File Name : J:\03_17_11\777337.D
Operator : ASD
Date Acquired : 18 Mar 2011 00:59
Sample Name : BLANK
Submitted by :
Vial Number : 2
AcquisitionMeth: DRUGS.M
Integrator : RTE

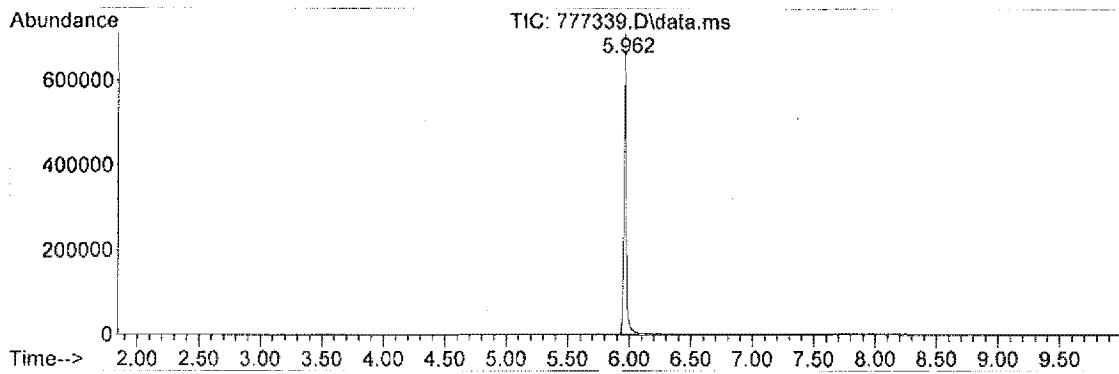


Ret. Time	Area	Area %	Ratio %
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NO INTEGRATED PEAKS

Information from Data File:

File Name : J:\03_17_11\777339.D
Operator : ASD
Date Acquired : 18 Mar 2011 1:24
Sample Name : OXYCODONE STD
Submitted by :
Vial Number : 21
AcquisitionMeth: DRUGS.M
Integrator : RTE



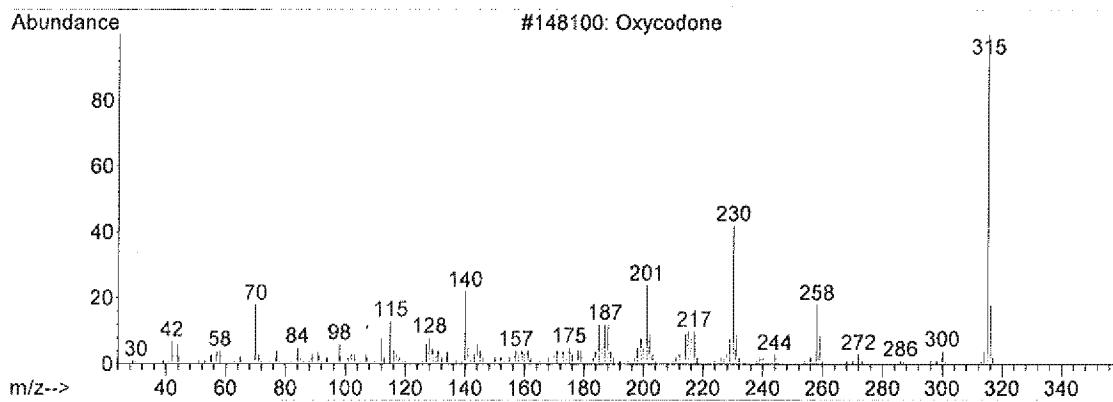
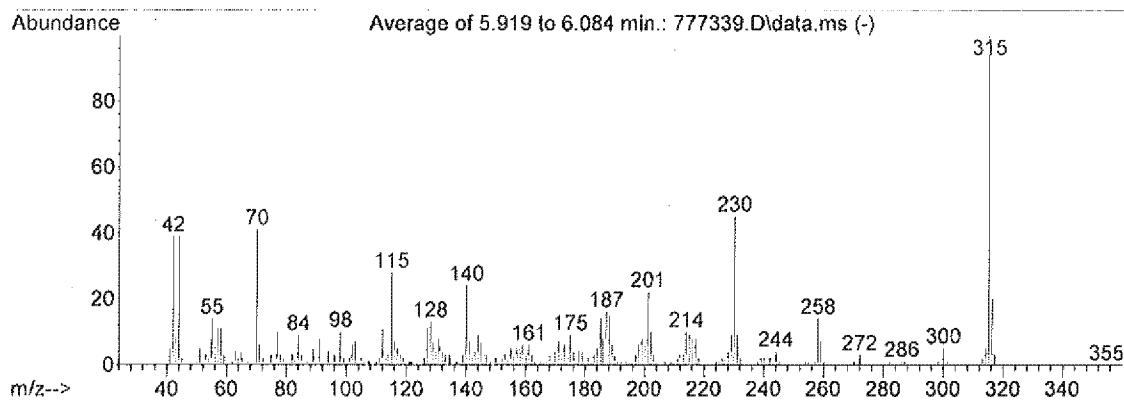
Ret. Time	Area	Area %	Ratio %
5.962	900047	100.00	100.00

Information from Data File:

File Name : J:\03_17_11\777339.D
Operator : ASD
Date Acquired : 18 Mar 2011 1:24
Sample Name : OXYCODONE STD
Submitted by :
Vial Number : 21
AcquisitionMeth: DRUGS.M
Integrator : RTE

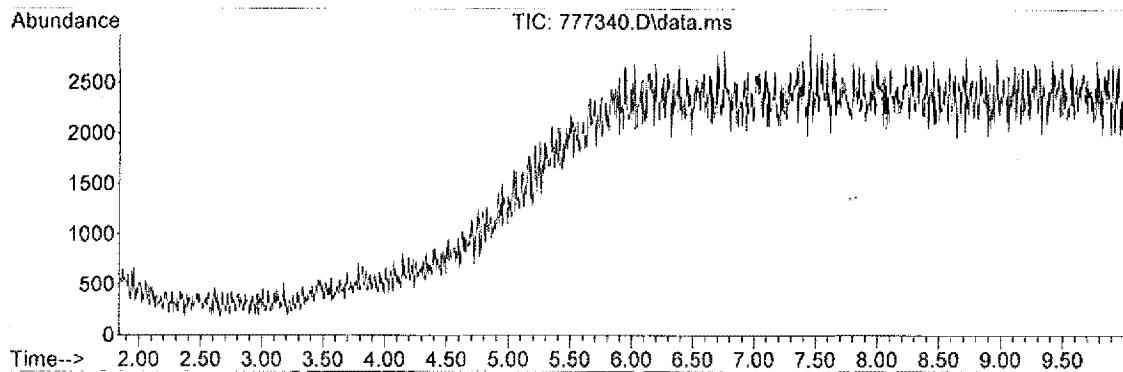
Search Libraries: C:\Database\SLI.L Minimum Quality: 80
C:\Database\NIST08.L Minimum Quality: 80
C:\Database\PMW_TOX2.L

PK#	RT	Library/ID	CAS#	Qual
1	5.96	C:\Database\NIST08.L		
		Oxycodone	000076-42-6	99
		Oxycodone	000076-42-6	99
		Oxycodone	000076-42-6	99



Information from Data File:

File Name : J:\03_17_11\777340.D
Operator : ASD
Date Acquired : 18 Mar 2011 1:36
Sample Name : BLANK
Submitted by :
Vial Number : 2
AcquisitionMeth: DRUGS.M
Integrator : RTE



Ret. Time	Area	Area %	Ratio %
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NO INTEGRATED PEAKS

Last page..... ...no further data